## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA, ex rel.

DILBAGH SINGH, M.D.,

PAUL KIRSCH, M.D.,

V. RAO NADELLA, M.D., and

MARTIN JACOBS, M.D.,

:

:

Relators.

:

v. : Civil Action No. 04-186E

:

BRADFORD REGIONAL
MEDICAL CENTER,
V & S MEDICAL ASSOCIATES, LLC,
PETER VACCARO, M.D.,
KAMRAN SALEH, M.D.,
and DOES I through XX,

:

Defendants. :

:

## **MOTION TO SEAL**

Bradford Regional Medical Center, through its undersigned counsel, hereby moves that Exhibits 5, 6 and 7 appended to its Motion to Quash (Document 74) filed with this Court on August 24, 2007 be entered under seal pursuant to the Court's previous Protective Order Governing Confidentiality of Documents to be Produced and Information Obtained in Discovery (Document 50), in order to allow any party to designate said documents as confidential as permitted by said Protective Order. Said Exhibits were inadvertently attached without a request that they be entered into the record under seal.

Respectfully submitted,

August 27, 2007 /s/ Daniel M. Mulholland III

Daniel M. Mulholland III, Esquire

HORTY, SPRINGER & MATTERN, P.C.

4614 Fifth Avenue Pittsburgh, PA 15213 412-687-7677 (phone) 412-687-7692 (fax)

dmulholland@hortyspringer.com

Attorney for

Bradford Regional Medical Center

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this date he served the following with a copy of the foregoing Motion to Seal by e-mail via the Court's ECF system and by first class United States mail, addressed as follows:

Andrew M. Stone Allegheny Building, Suite 1400 429 Grant Street Pittsburgh, PA 15219

G. Mark Simpson Simpson Law Firm, LLC 165 North Main Street Jonesboro, GA 30236

Carl J. Rychcik Fox Rothschild, LLP 625 Liberty Avenue, 29th Floor Pittsburgh, PA 15222

Paul E. Skirtich Assistant U.S. Attorney Western District of PA U.S. Post Office & Courthouse 700 Grant Street, Suite 4000 Pittsburgh, PA 15219

This 27th day of August 2007.

/s/ Daniel M. Mulholland III
Daniel M. Mulholland III, Esquire